

FILED

2013 OCT 23 PM 3:45

CLERK U.S. DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

BY CXL DEPUTY

UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF CALIFORNIA

December 2012 Grand Jury

UNITED STATES OF AMERICA,

Plaintiff,

v.

MICHAEL LUSTIG,
aka "George,"

Defendant.

Case No.

'13 CR 3921 BEN

I N D I C T M E N T

Title 18, U.S.C., Sec. 1591(a) and
(b) - Sex Trafficking of Children;
Title 18, U.S.C., Sec. 1594(d) -
Criminal Forfeiture

16 The grand jury charges:

Count 1

17
18 On or about and between March 2011 and June 2012, within the
19 Southern District of California, defendant MICHAEL LUSTIG,
20 aka "George," in and affecting interstate commerce, knowingly did
21 recruit, entice, harbor, transport, provide, obtain, and maintain by
22 any means a person, to wit: a 11-12 year old minor female (MF1 - DOB:
23 2/2000), knowing and in reckless disregard of the fact that MF1 would
24 be caused to engage in a commercial sex act, having had a reasonable
25 opportunity to observe MF1 and knowing and in reckless disregard of
26 the fact that MF1 had not attained the age of 18 years; in violation
27 of Title 18, United States Code, Section 1591(a) and (b).

Count 2

On or about and between August 2011 and December 2011, within the Southern District of California, defendant MICHAEL LUSTIG, aka "George," in and affecting interstate commerce, knowingly did recruit, entice, harbor, transport, provide, obtain, and maintain by any means a person, to wit: a 13 year old minor female (MF2 - DOB 1/1998), knowing and in reckless disregard of the fact that MF2 would be caused to engage in a commercial sex act, having had a reasonable opportunity to observe MF2 and knowing and in reckless disregard of the fact that MF2 had not attained the age of 18 years; in violation of Title 18, United States Code, Section 1591(a) and (b).

FORFEITURE ALLEGATIONS

1. The allegations contained in Counts 1 and 2 of this Indictment is realleged and by their reference fully incorporated herein for the purpose of alleging forfeiture to the United States of America pursuant to the provisions of Title 18, United States Code, Section 1594(d).

2. Upon conviction of the offense alleged in Count 1, which involve violations of Title 18, United States Code, Section 1591, defendant MICHAEL LUSTIG, aka "George," shall forfeit to the United States, pursuant to Title 18, United States Code, Section 1594(d) all right, title and interest in: (1) any property, real or personal, used or intended to be used to commit or to facilitate the commission of the offense; and (2) any property, real or personal, constituting or derived from, any proceeds obtained, directly or indirectly, as a result of the offense. The property to be forfeited includes, but is not limited to, the following:

- 1 a. Kyocera flip phone with phone number 619-634-9405;
- 2 b. iPhone with phone number 619-791-6552;
- 3 c. Verizon Wireless Samsung cell phone with phone
Number(619) 977-4300;
- 4 d. Cricket Samsung cell phone with phone number
(619)799-3816; and
- 5 e. 2011 Lincoln MKZ, California License Plate No. 6RZD553,
6 VIN # 3LNDL2L30BR766013.

7 3. If any of the forfeitable property described above in
8 Paragraph 2, as a result of any act or omission of the defendant:

- 9 a. cannot be located upon the exercise of due diligence;
- 10 b. has been transferred or sold to, or deposited with, a
11 third party;
- 12 c. has been placed beyond the jurisdiction of the Court;
- 13 d. has been substantially diminished in value; or
- 14 e. has been commingled with other property which cannot be
15 subdivided without difficulty; it is the intent of the United States,
16 pursuant to Title 18, United States Code, Section 2253(o), to seek
17 forfeiture of any other property of the defendant up to the value of
18 the forfeitable property described above in Paragraph 2.

19 All pursuant to Title 18, United States Code, Section 1594(d).

20 DATED: October 23, 2013.

21 A TRUE BILL:

22 
23 Foreperson

24 LAURA E. DUFFY
25 United States Attorney

26 By: 
27 ALESSANDRA P. SERANO
28 Assistant U.S. Attorney